

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA

FILED

FEB 16 1999

IN RE: )  
INTERNATIONAL HERITAGE, INC., )  
 )  
Address: )  
2626 Glenwood Ave., #200 )  
Raleigh, NC 27608 )  
ID#: 56-1921093 )  
Debtor. )

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.  
CASE NO.: 98-02675-5-AT

SUPPLEMENTAL  
APPLICATION FOR POST-PETITION RENT  
11 U.S.C. SECTIONS 503 AND 506

NOW COMES Printing Plus, Inc. by and through counsel and submits this application for post-petition rent as an administrative claim pursuant to 11 U.S.C. § 503 and an alternative claim under 11 U.S.C. Section 506.

IN SUPPORT OF ITS APPLICATION, Printing Plus, Inc. shows the following unto the court:

1. Printing Plus, Inc. is a creditor in the above-referenced matter.
2. This bankruptcy was filed on or about November 25, 1998. Prior to the bankruptcy filing, Printing Plus, Inc. allowed the debtor to store its products in its warehouse. The products have remained in the Printing Plus warehouse, but the Trustee scheduled them for sale by auction on February 6, 1999.
3. Rent has accrued on the storage space at the rate of \$4,246.25 per month.
4. An application for post-petition rent was filed on January 6, 1999.
5. One of the Trustee's objection to the allowance of rent under § 503 is that there are liens on the property scheduled for sale.
6. An Order Authorizing Sale of Property Free and clear of Liens was entered on February 3, 1999.
7. The Trustee objected to the allowance of rent under § 506(c) because the lienholders were not served with the application. The lienholders will be served with a copy of this application as documented by the certificate of service attached hereto.
8. The storage provided by Printing Plus, Inc. has been and is beneficial and necessary to preserve and protect the assets of the Bankruptcy Estate.
9. The auction took place on February 6, 1999 and Printing Plus, Inc. has incurred expenses in the clean up after the auction. Printing Plus, Inc. requests reimbursement for said expenses. Upon information and belief, arrangements have been made for the reimbursement of expenses including, but not necessarily limited to, a charge of \$100.00 for labor, the cost of the dumpsters, and the trash pickup.

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WHEREFORE, Printing Plus, Inc. prays the court to enter an order allowing it to recover post-petition rents pursuant to 11 U.S.C. § 503 or, in the alternative, pursuant to 11 U.S.C. § 506. Printing Plus, Inc. also prays the court to enter an order providing for reimbursement of the expenses described herein.

Respectfully submitted, this the 12th day of February, 1999.

JORDAN PRICE WALL GRAY, JONES & CARLTON

Attorneys for Printing Plus, Inc.

By: Shawna Y. Staton

Shawna Y. Staton

State Bar No. 16512

P.O. Box 2021

Raleigh, NC 27602

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NOTICE

TO: THE DEBTOR, ATTORNEY FOR THE DEBTOR, TRUSTEE AND OTHER PARTIES  
IN INTEREST

NOTICE IS HEREBY GIVEN of the Application for Allowance of Post-Petition Rent as an Administrative Claim filed simultaneously herewith by Printing Plus, Inc. in the above captioned case; and

FURTHER NOTICE IS HEREBY GIVEN that this application may be allowed provided no response and request for a hearing is made by the debtor, trustee or other parties in interest in writing to the Clerk of this Court within twenty (20) days from the date of this notice; and

FURTHER NOTICE IS HEREBY GIVEN that if a response and a request for a hearing is filed by the debtor, trustee, or other parties in interest named herein in writing within the time indicated, a hearing will be conducted on the motion and response thereto at a date, time and place to be later set by this Court and all interested parties will be notified accordingly. If no request for a hearing is timely filed, the Court may rule on the motion and response thereto ex parte without further notice.

DATE OF NOTICE: 2-12-99

JORDAN PRICE WALL GRAY JONES & CARLTON, P.L.L.C.  
Attorneys for Printing Plus

By: Shawna Y. Staton  
Shawna Y. Staton  
State Bar No. 16512  
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(919) 828-2501

UNITED STATES BANKRUPTCY COURT  
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	)	
Debtor.	)	

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served a copy of the foregoing Supplemental Application for Allowance of Post-Petition Rent as an Administrative Claim, Notice, and (proposed) Order by depositing a copy of the same in the United States Mail, postage prepaid, in envelopes addressed to the following:

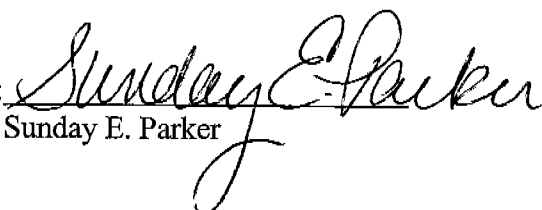
Holmes P. Harden, Esq.  
Maupin, Taylor & Ellis, P.A.  
3200 Beechleaf Ct., Suite 500  
P.O. Drawer 19764  
Raleigh, NC 27619-9764  
*Bankruptcy Trustee*

Marjorie K. Lynch  
Bankruptcy Administrator  
P.O. Box 3758  
Wilson, NC 27894-3758  
*Bankruptcy Administrator*

Terri L. Gardner  
Smith Debman Narron & Myers, LLP  
4700 New Bern Avenue  
P.O. Box 26268  
Raleigh, NC 27611-6268  
*Attorney for Debtor*

\*\* Also, all creditors listed on the following page.

This 12th day of February, 1999.

By:   
Sunday E. Parker

Jewels by Evonne, Inc.  
1879 Buford Highway, Suite 7  
Buford, GA 30518

Stanley H. VanEtten  
10504 Tredwood Drive  
Raleigh, NC 27613

Mayflower Capital, L.L.C.  
2626 Glenwood Avenue, Suite 100  
Raleigh, NC 27608

J. C. Faulhaber  
923 South 4<sup>th</sup>  
LaConner, WA 98257

Lois Coonc  
Post Office Box 699  
LaConner, WA 98257

Gary D. McDowell  
1138 Ascott Valley Drive  
Duluth, GA 30097

Advanced Equities  
Post Office Box 1042  
Winnfield, LA 71483

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St. Gallon  
Vadianstrasse 17  
CH-9000 St. Gallen

UBS, Zuerich  
Direkton  
Gahnhofstrasse 45, Postfach  
CH-8021 Zurich

Schweizerische Hypotheken  
Handelsbank, Zurich  
Bahnhofstrasse/Schutzengasse  
CH-8023 Zurich

Coeco  
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Raleigh, NC 27604

Business Credit Leasing, Assignee  
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Marshall, MN 56258

EOS Financial Services  
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Raleigh, NC 27602

Centrum Bank, AG Vaduz  
Heiligkreuz 8, Postfoch 1168  
FL-9490Vaduz

Emil Schatz, St. Gallen  
Oberhofstettenstrasse 67C  
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Accurata Treuhand und Revisions  
AG Vaduz  
Abundt 36  
FL-9490, Vaduz

Mareco Treuhand Anstalt  
Schlossweg 24  
FL-9496, Balzers

UBS AG, Zurich Direktion  
Bahnhofstrasse 45  
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CH-8021, Zurich